

FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

JUN 24 2020

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

COREY EPPS,

Defendant.

4:20CR290 SEP/NCC

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and J. Christian Goeke, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. The defendant is charged with Felon in Possession of a Firearm in violation of 18 U.S.C. § 922(g)(1), an offense for which a maximum 10-year imprisonment is prescribed under Title 18.

2. According to St. Louis Metropolitan Police Department complaint number 20-014695, on April 1, 2020, officers with the St. Louis Metropolitan Police Department were dispatched a McDonald's restaurant located at 1119 N. Tucker for a suspicious occupant of a vehicle in the drive-thru lane. Upon arrival, the officers observed Defendant slumped behind the wheel of a Nissan in the drive-thru lane with the vehicle in gear and Defendant's foot on the brake. After approaching the vehicle, the officers observed a handgun in plain view on the front passenger seat. The officers knocked on the driver's window to awaken Defendant after which he

was advised to place the vehicle in park and to exit to which he complied after which the officers seized the firearm, a fully loaded Glock 17 semi-automatic pistol. A computer inquiry indicated that Defendant had active warrants and was a convicted felon. Defendant was placed under arrest and a search subsequent to arrest revealed a plastic bag in his pocket containing numerous white pills that tested positive for Clonazepam and Oxycodone. Defendant was advised of his rights per the *Miranda* decision after which he admitted to knowingly possessing the firearm and the drugs.

3. Defendant has demonstrated a pattern of careless, negligent and dangerous possession of firearms. In the instant offense, Defendant possessed a firearm while also in possession of controlled substances and passed out in a running car while in gear in the drive-thru of a public restaurant. Defendant's prior conviction for Endangering the Welfare of a Child and Tampering with Physical Evidence involved a child shooting himself with a firearm that belonged to Defendant after which Defendant tampered with the evidence prior to the arrival of law enforcement.

4. The defendant's criminal history and the nature and circumstances of the offense charged reflects that there is a serious danger to the community that would be posed by the defendant's release.

5. Due to the weight of the evidence against defendant and defendant's history and characteristics, which includes a conviction for tampering with evidence, there is a serious risk that the defendant will flee.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community and the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ J. Christian Goeke
J. CHRISTIAN GOEKE, #39462(MO)
Assistant United States Attorney